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5 Attorney for Defendant  
IMAGEM PRODUCTION MUSIC LLC  
6 d/b/a 5 ALARM MUSIC and d/b/a  
CYPRESS CREEK MUSIC  
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10 UNITED STATES DISTRICT COURT  
11 CENTRAL DISTRICT OF CALIFORNIA – WESTERN DIVISION

12 RICHARD FRIEDMAN, an individual,  
13 Plaintiff,

14 vs.

15 HANS ZIMMER, individually, and doing  
business as REMOTE CONTROL  
SONGS; TWENTIETH CENTURY FOX  
FILM CORPORATION; FOX  
SEARCHLIGHT PICTURES INC.; FOX  
ENTERTAINMENT GROUP, INC.;  
16 NEW REGENCY PRODUCTIONS,  
INC.; RIVER ROAD  
ENTERTAINMENT LLC; PLAN B  
ENTERTAINMENT, INC.; REMOTE  
CONTROL PRODUCTIONS, INC.,  
SONY MUSIC ENTERTAINMENT;  
17 IMAGEM PRODUCTION MUSIC LLC,  
individually, and doing business as 5  
ALARM MUSIC and also doing  
business as CYPRESS CREEK MUSIC;  
18 DOES ONE through TEN, inclusive,

19 Defendants.  
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Case No. **2:15-CV-00502 GHK-E**

**STIPULATION EXTENDING TIME  
FOR DEFENDANT IMAGEM TO  
RESPOND TO PLAINTIFF'S FIRST  
AMENDED COMPLAINT**

[[Proposed] Order Granting Stipulation  
Extending Time For Defendant Imagem  
To Respond To Plaintiff's First Amended  
Complaint Concurrently Filed]

Action Filed: January 22, 2015

1 This Stipulation is entered by and between Plaintiff Richard Friedman  
2 (“Plaintiff”), on the one hand, and Defendant Imagem Production Music LLC d/b/a  
3 5 Alarm Music and d/b/a Cypress Creek Music (“Imagen”), on the other hand, with  
4 reference to the following facts:

5 WHEREAS, Plaintiff filed a First Amended Complaint (“FAC”) on March 23,  
6 2015, and served the FAC by mail on Imagem on April 14, 2015;

7 WHEREAS, pursuant to the Federal Rules of Civil Procedure, Imagem  
8 presently has until May 1, 2015, to respond to Plaintiff’s FAC;

9 WHEREAS, Imagem has been diligently evaluating the FAC and how to  
10 respond thereto;

11 WHEREAS, Plaintiff has agreed to extend the deadline for Imagem to answer  
12 or otherwise respond to the FAC by thirty additional days, such that the new deadline  
13 will be June 1, 2015;

14 WHEREAS, no prior extensions have been requested;

15 THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and  
16 between the undersigned attorneys for the respective parties, and subject to the  
17 approval of the Court, that Imagem has until and including June 1, 2015, to answer or  
18 otherwise respond to Plaintiff’s FAC.

19 DATED: April 30, 2015

20 BLECHER COLLINS PEPPERMAN & JOYE, P.C.

21 MAXWELL M. BLECHER

22 DONALD R. PEPPERMAN

JOHN E. ANDREWS

23 LAW OFFICES OF JEFFREY L. GRAUBART, P.C.

24 JEFFREY L. GRAUBART

25 By: /s/ Jeffrey L. Graubart

26 Jeffrey L. Graubart

27 Attorneys for Plaintiff Richard Friedman

1 DATED: April 30, 2015  
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DAVIS WRIGHT TREMAINE LLP  
DIANA PALACIOS

5 By: /s/ Diana Palacios  
6 Diana Palacios  
7 Attorney for Defendant  
8 IMAGEM PRODUCTION MUSIC LLC  
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